

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
as representative of : Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO *et* : (Jointly Administered)
al., :
Debtors.¹ X

**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL
MONITOR LLC AT OMNIBUS HEARING SCHEDULED FOR
APRIL 28-29, 2021**

TO THE HONORABLE COURT:

COME NOW Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government Development Bank

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

for Puerto Rico² under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this motion to inform (the “Informative Motion”) in compliance with this Honorable Court’s *Order Regarding Procedures for April 28-29, 2021, Omnibus Hearing* [Dkt. No. 15902] (the “Procedures Order”),³ and respectfully states as follows:

1. Douglas S. Mintz and/or Peter J. Amend of Schulte Roth & Zabel LLP will appear on behalf of Collateral Monitor at the April 28-29, 2021 Omnibus Hearing (the “Omnibus Hearing”), which will be conducted telephonically via CourtSolutions.
2. Mr. Mintz and/or Mr. Amend may present oral argument related to the following pleadings:
 - a. *Debtors’ Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* [Dkt. No. 16332];
 - b. *Response and Objection of Individual Bondholder to Debtors’ Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement, (III) Approving Form of Notice, and (IV) Establishing Document Depository Procedures* [Dkt. No. 16387];
 - c. *Limited Opposition To Debtors’ Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* [Dkt. No. 16388];
 - d. *Objection of Ambac Assurance Corporation to Debtors’ Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for*

² See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

³ Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16395];

- e. *Limited Objection of Official Committee of Unsecured Creditors to Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16398];*
- f. *The DRA Parties' Limited Objection to Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16402];*
- g. *Objection of Financial Guaranty Insurance Company to the Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16423];*
- h. *Reservation of Rights of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and National Public Finance Guarantee Corporation in their Capacity as Revenue Bondholders, to Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16457];*
- i. *Omnibus Reply of the Financial Oversight and Management Board for Puerto Rico in Support of Debtors' Joint Motion for an Order (I) Scheduling Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief [Dkt. No. 16507]; and*
- j. Any other responses or filings related to the foregoing.

3. In addition, the Collateral Monitor reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Omnibus Hearing, or raised by any party at the Omnibus Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

4. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, will attend the Omnibus Hearing through the listen-in access lines provided by the Court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of April 2021.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

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